

1 **MARK JUBELT (SBN 132772)**
2 **LAW OFFICES OF SCHNEIDER & HOSMER**
3 333 University Avenue, Suite 210
4 Sacramento, California 95825
5 Direct: (424) 443-4465
6 Main: (916) 921-9353
7 Facsimile: (855) 214-7884
8 Email: jubelm1@nationwide.com
9 Service: TDSACNEW@Nationwide.com

10 Attorneys for Defendant,
11 FAMILY DOLLAR, LLC (DOE 1)

12 UNITED STATES DISTRICT COURT
13 EASTERN DISTRICT OF CALIFORNIA

14 TANYA FANG, an individual; and PANGGE
15 FANG, an individual

16 Plaintiff,

17 vs.

18 FAMILY DOLLAR STORES, LLC, a limited
19 liability company; and DOES 1 to 50, inclusive,

20 Defendants.

Case No. 1:24-cv-00692 KES-BAM [*Fresno
County Superior Court Case No.
23CECG03332*]

**STIPULATION AND ORDER TO
REMAND CASE TO STATE COURT**

Complaint Filed: August 15, 2023

THE PARTIES TO THIS ACTION HEREBY STIPULATE AS FOLLOWS:

1. Plaintiffs TANYA FANG and PANGEE FANG commenced the above-entitled civil action in the Superior Court for the County of Fresno by filing a complaint entitled *Tanya Fange; and Pangee Fang v. Family Dollar Stores, LLC; and Does 1 to 50, inclusive*, Case No. 23CECG03332.

1. Defendant, FAMILY DOLLAR, LLC (DOE 1) on May 7, 2024, filed through its prior attorneys, Charles D. May and Andrea Breuer of Tharpe & Howell, Answer to Complaint in the *Tanya Fange; and Pangee Fang v. Family Dollar Stores, LLC*, et al, Fresno County Superior Court

Case No. 23CECG03332.

2. Defendant, FAMILY DOLLAR, LLC (DOE 1) on June 13, 2024, filed through its prior attorneys, Charles D. May and Andrea Breuer of Tharpe & Howell, a Notice of Removal of Action under 28 U.S.C. §1332 and §1441(b) to have the herein matter removed from the Superior Court of the State of California, County of Fresno to the United States District Court, Eastern District of California on the basis of diversity of citizenship under 28 U.S.C. §1332(a). Defendant's attorney at the time stated that this matter was an action between citizens of different states and the amount in controversy exceeded the state court's jurisdiction

3. On September 11, 2024, Defendant FAMILY DOLLAR, LLC filed an Amended Consent Order Granting Substitution of Attorney wherein Mark Jubelt of the Law Offices of Schneider & Hosmer was the attorney of record for Defendant FAMILY DOLLAR, LLC.

4. Plaintiffs' attorney of record and Defendant's attorney of record have been meeting regarding the herein matter, and the parties have agreed that this matter should be remanded to the State of California, County of Fresno Superior Court as was originally commenced.

5. The parties further stipulate that this matter should be instantly remanded to the County of Fresno Superior Court upon the signing of the Order contained herein.

Dated: April 9, 2025

CARTER LAW GROUP

/s/ Daniel L. Carter

DANIEL L. CARTER

Attorneys for Plaintiffs, TANYA FANG and
PANGEE FANG

Dated: April 10, 2025

LAW OFFICES OF SCHNEIDER & HOSMER

/s/ Mark Jubelt

MARK JUBELT

Attorneys for Defendant, FAMILY DOLLAR, LLC

ORDER

Pursuant to the parties' stipulation, and good cause appearing, this matter shall be remanded back to the County of Fresno Superior Court. The Clerk of the Court is directed to mail a copy of this order to the County of Fresno Superior Court and close this case.

IT IS SO ORDERED.

Dated: April 10, 2025



UNITED STATES DISTRICT JUDGE